

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company  
in the 2000 Annual Transition Cost Proceeding.  
(U 39 E)

Application 00-09-001

**ADMINISTRATIVE LAW JUDGE'S RULING  
REQUESTING FURTHER COMMENTS**

In its reply brief dated July 20, 2001, the Office of Ratepayer Advocates (ORA) argues:

“Despite its present claim that the RAP cannot encompass procurement costs, PG&E seems to assert a contrary position in its 2000-2001 RAP Application:

“[t]he RAP was designed to verify, and adjust as necessary, entries made to the TRA . . . . The TRA is credited with total revenues and offset with . . . Commission-approved obligations, including Power Exchange (PX) charges [and] Independent System Operator (ISO) charges. . . . Also, the ISO allocates various charges to the PX as a scheduling coordinator and these charges are passed through to distribution customers as part of the utility's cost of energy procurement. These ISO and PX-related charges are accounted for in the TRA for purposes of calculating headroom.” (A.01-06-003, p. 2, filed June 1, 2001.)

PG&E seems to have no qualms about recording PX-related energy procurement costs into its TRA and verifying them through the RAP, and so one must question why it is now seeking recovery of nearly identical expenses through the ATPC.” (ORA reply brief, p. 4, emphasis added.)

A.00-09-001 BDP/jgo

Since this argument was raised in ORA's reply brief, Pacific Gas and Electric Company has not had the opportunity to respond.

Therefore, **IT IS RULED** that Pacific Gas & Electric Company shall file a limited response to issue raised above, no later than April 12, 2002.

Dated March 20, 2002, at San Francisco, California.

/s/ BERTRAM D. PATRICK

Bertram D. Patrick  
Administrative Law Judge

**CERTIFICATE OF SERVICE**

I certify that I have by mail this day served a true copy of the original attached Administrative Law Judge's Ruling Requesting Further Comments on all parties of record in this proceeding or their attorneys of record.

Dated March 20, 2002, at San Francisco, California.

/s/ JACQUELINE GORZUCH  
Jacqueline Gorzuch

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.